

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	CC Docket No. 94-102
To Ensure Compatibility With	)	
Enhanced 911 Emergency Calling	)	
Systems	)	

To: Chief, Wireless Telecommunications Bureau

**SECOND SUPPLEMENT TO AMENDED REQUEST FOR TEMPORARY STAY**

1. Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois ("First Cellular") hereby supplements its "Request for Temporary Stay," filed August 13, 2002, and its "Amended Request for Temporary Stay" (collectively "the Request"), filed September 4, 2002 at Paragraph No. 3 to include the attached January 8, 2003 e-mail (Attachment C) from the Randolph County, Illinois Public Safety Answering Point ("PSAP") announcing that it will not be able to process Phase II E-911 Automatic Location Identification ("ALI") information data until some indeterminate future date.

2. By way of background information, the Request was filed pursuant to Section 1.3 of the Rules and the Commission's recent Order to Stay, FCC 02-210, released July 26, 2002 ("Stay Order"), and requests a temporary stay, up to and including September 1, 2003 or the date occurring six months following receipt of a valid PSAP request for Phase II E-911 ALI information (whichever is later), of the Rule 20.18(f) requirement that First Cellular provide Phase II E-911 service to at least 50% of the its coverage area or population by the date specified in that regulation. Under

the definitions set forth in the Stay Order, First Cellular is a Tier III carrier providing non-nationwide Commercial Mobile Radio Service. First Cellular intends to implement a network-based Phase II E-911 ALI solution.

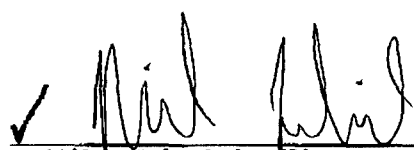
3. First Cellular was prompted to file the Request because the Randolph County PSAP had requested (in a February 20, 2002 e-mail) Phase II E-911 ALI service, apparently by August 20, 2002. However, as the attached January 8, 2003 e-mail attests, the Randolph County PSAP not only was unable to receive and process the requested Phase II E-911 information by the apparent August 20, 2002 deadline, but also is unable to receive and process this information at this time. Indeed, the Randolph County PSAP is unable even today to provide a date certain by which it will be able to receive and process the requested information. While we do not wish to belabor the point, it is readily apparent that the Randolph County PSAP's conduct in this matter falls well short of the standards of behavior laid down by the Commission in City of Richardson, FCC 01-293, released October 17, 2001 and in City of Richardson (Reconsideration Decision), FCC 02-318, released November 26, 2002.

WHEREFORE, good cause shown, First Cellular requests that the requested temporary stay be granted.

Respectfully submitted,  
Southern Illinois RSA  
Partnership d/b/a First  
Cellular of Southern Illinois

King City Square  
417 South 42nd Street  
Mt. Vernon, IL 62864  
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Dated: ✓ 1-16-03

By: ✓   
Mike Jaksich, Vice President  
Network Operations

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-----Original Message-----

From: cindy wagner [mailto:cindywagner67@hotmail.com]

Sent: Wednesday, January 08, 2003 2:15 PM

To: mjaksich

Subject: Re: Randolph County IL - Phase 11

January 8, 2003

To Whom it may concern,

This letter is regarding implementation of Phase 11 wireless service. There are 2 issues of concern that will delay Randolph County Phase 11 readiness in next few months.

First, the fact that Verizon Lec has stated all counties being served off of

the Carbondale router need to be in agreement of a format change, and it would be desirable if the counties were ready for phase 11 service nearing the same time. This is an issue because no other county besides Randolph has requested phase 11 service. However, the area counties do anticipate forwarding thier letter of request within the next few months.

Secondly, Randolph County is in the process of implementing a GIS mapping system. And, although Randolph County E-911 has a working mapping system for Phase 11 wireless, the ETSB would like to explore the possibility of implementing Phase 11 wireless on the new GIS mapping system. This system should be in place by early 2003 and in January the 911 Administrative Office will begin researching the mapping system that would be most feasible

for 911. This process is anticipated to take only a few months, so it is quite possible that Randolph County E-911 would be accepting of Phase 11 wireless calls by mid-year 2003.

Upon notification of the mapping system in place and area counties readiness, I will notify your company to begin implementation of Phase 11 service in Randolph County. It is the hope of the ETSB that due to the fact

that the Randolph County letter of request was forwarded months ago Randolph

County will remain the first county to be implemented.

Thank you for your assistance in this matter, I look forward to working with you in the implementation of Phase 11 wireless service.

Please notify me that you have received this response.

Cindy Wagner  
Randolph County 911 Administrator

>From: James.Elter@VerizonWireless.com  
>To: cindywagner67@hotmail.com  
>CC: step2sh@GL.Verizonwireless.com, esmith-thorne@intrado.com,  
>mchalpe@se.verizonwireless.com, buchajo@se.verizonwireless.com  
>Subject: Randolph County IL - Phase 2  
>Date: Wed, 27 Nov 2002 10:32:55 -0500  
>  
>Cindy - Hi. I wanted to follow up from our conversation on Monday  
>concerning  
>phase 2 deployment for Randolph County Illinois. During the conversation  
>you  
>stated that Randolph County faces two (2) issues that will put the phase 2  
>deployment on hold. 1.) Verizon SR needs to have all the psaps' serviced by  
>that SR, agree to the upgrade, which very few or none have done at this  
>time; 2.) I believe you stated that you also have CPE issues that need to  
>be  
>addressed. If you could respond to this e-mail that if in fact is the case  
>(you want to have a Q1 '03 launch), it would be appreciated. We are  
>planning  
>for phase 2 deployments, and I want to ensure that Randolph County IL is  
>accounted for.  
>  
>Call or write if you have any questions.  
>  
>Regards  
>Jim  
>  
>Jim Elter  
>Member of Technical Staff - Voice Product Implementation and Coordination  
>Technology Development and Implementation  
>Verizon Wireless  
>30 Independence Blvd.  
>Warren, NJ 07059  
>Office: 908.607.8098  
>Mobile: 908.872.4898  
>james.elter@verizonwireless.com

James,

This is the follow up response to your email dated November 27, 2002.

I received your email briefing our conversation regarding implementing Phase 11 wireless in Randolph County. Both points discussed are key points in the implementation of Phase 11 wireless service for Randolph County.

First, the fact that Verizon Lec has stated all counties being served off of the Carbondale router need to be in agreement of a format change at the same time. This is an issue because no other county besides Randolph has requested phase 11 service. However, the area counties do anticipate forwarding thier letter of request within the next few months.

Secondly, Randolph County is in the process of implementing a GIS mapping system. And, although Randolph County E-911 has a working mapping system for Phase 11 wireless, the ETSB would like to explore the possibility of implementing Phase 11 wireless on the new GIS mapping system. This system should be in place by early 2003 and in January the 911 Administrative Office will begin researching the mapping system that would be most feasible

for 911. This process is anticipated to take only a few months, so it is quite possible that Randolph County E-911 would be accepting of Phase 11 wireless calls by March of 2003.

Upon notification of the mapping system in place and area counties readiness, I will notify Verizon Wireless to begin implementation of Phase 11 service in Randolph County. It is the hope of the ETSB that due to the fact that the Randolph County letter of request was forwarded months ago Randolph County will remain the first county to be implemented.

Thank you for your assistance in this matter, I look forward to working with you in the implementation of Phase 11 wireless service.

Please notify me that you have received this response.

Cindy Wagner  
Randolph County 911 Administrator